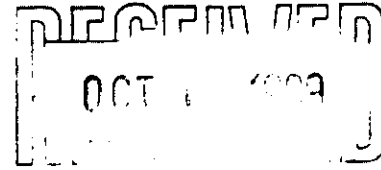




OCT 16 1989

Reply Attention of: HW-112



Mr. Hunter Weiler  
U.S. Department of Energy  
Idaho Operations Office  
785 DOE Place  
Idaho Falls, Idaho 83402

RE: Summary Assessment Reviews

Dear Mr. Weiler:

We have reviewed the summary assessments for the following Solid Waste Management Units:

Rockwell	SMC Septic Tank and Drain Field
NRF	SWMU #4 Top Soil Pit Area
IET-07	Hot Waste Tank
ARA-07	ARA-II Seepage Pit
ARA-09	ARA-II Septic Tank
ARA-10	ARA-II Septic Tank East
ARA-11	ARA-II Septic Tank West
PBF-03	PBF Control Area Septic Tank for PBF-632 and Seepage Pits
EOCR-04	Septic Tank
CPP-41	Fire Training Pits
CPP-43	Grease Pit
CPP-70	Septic Tank East of CPP-655
CPP-71	Seepage Pits West of CPP-656
CPP-76	Septic Tank West of CPP-659
CPP-77	Seepage Pit and Cesspool North of CPP-662

The Summary Assessments for Rockwell SMC Septic Tank and Drain Field, NRF SWMU #4, ARA-7, ARA-9, ARA-10, PBF-03, and EOCR-04 are sufficient to support the deletion of these seven (7) units from the RCRA universe. In accordance with Paragraph D.1(a) of Appendix I to the Consent Order and Compliance Agreement ("Agreement"), we concur with the findings of the above identified summary assessments.

EPA intends to quality assure the accuracy of the summary assessments by periodically reviewing the support information referenced. Although we are concurring with the conclusions reached for selected summary assessments, it must be noted this decision is based on the assumption the information is correct. For quality assurance purposes we request all supporting information (i.e., notes, interview logs, drawings, etc.) for the

summary assessments for: ARA-7, ARA-9, ARA-10, and PBF-03 be submitted for our review. If any summary assessment is found to be deficient, we will require each summary assessment to include all supporting information.

In accordance with Paragraph D1(b) of the Agreement we have identified additional information needs for the other units reviewed.

**IET-07 Hot Waste Tank:** This assessment references the closure plan of October 1986 for the IET Container Storage Unit. This closure plan was never approved, (see EPA letter to Cliff Clark from 10/27/87 of which a copy is enclosed). A copy of the closure certificate (from the unapproved closure plan) has not been received.

**ARA-7, ARA-9, and ARA-10:** These units which are all connected, have been approved for deletion from the list. The summary assessments did not address the possibility of radioactive contamination. Radioactive contamination does not fall under RCRA regulation, but if these units are found to be radioactively contaminated they would be subject to regulation under CERCLA or AEA.

**ARA-11:** The history of this unit indicates the building may have also been used as a light laboratory. More information is needed to determine if this unit should be deleted from the list.

**CPP-41:** This unit is proposed for administrative closure due to construction over the former pit area. More detail is needed on the location of the unit under the building and the location and construction of the building.

**CPP-43:** This unit is also proposed for administrative closure due to construction over the unit. EPA commented on this summary assessment in a letter dated January 5, 1988. The comments were not addressed in the revisions of the summary assessments. The description of how the unit is located under the building needs to be expanded. The years of operation of the unit are not provided. Identify the solvents likely to have been used during the years of operation. Provide the size of the operation which would have impacted the pit.

**CPP-70:** This summary assessment references two engineering drawings, only one of which was included with the packet. The drawing which was included (057140) does not provide information on floor drains from the unit.

**CPP-71:** This summary assessment also references two engineering drawings, only one of which was provided. The drawing does not show the drainage system from the CPP-655, and it cannot be concluded that there are no floor drains from the work area. Information from the summary assessment for CPP-71 and CPP-70 does not make it clear if CPP-655 had no floor drains in the work

area, or if the statements are meant to say the drains could not drain to the septic system. This point should be verifiable by an inspection of the building and a more comprehensive look into the building history to see if there formerly were floor drains.

**CPP-76:** This document references three engineering drawings, only one of which is provided. This summary assessment does not contain sufficient information on the history of the unit. The assessment also states that a septic tank was removed during construction. The one engineering drawing provided (135505), states that the cess pool and septic tank are to be abandoned in place.

**CPP-77:** Revise and resubmit this summary assessment after the sampling data is available.

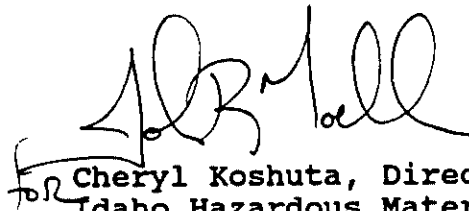
There were other engineering drawings submitted with the ICPP summary assessments, however the drawing numbers did not match the ones referenced in the assessments.

Please contact Jeffry Rodin of EPA Region 10 at FTS 399-2859 if you would like to discuss any of these comments.

Sincerely,



Michael Gearheard, Chief  
Waste Management Branch



for Cheryl Koshuta, Director  
Idaho Hazardous Material  
Bureau